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MEMO ENDORSED

## Federal Defenders OF NEW YORK, INC.

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Executive Director

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November 1, 2021

## BY ECF AND EMAIL

Honorable Andrew L. Carter, Jr. United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: <u>United States v. Hossein Wasiri,</u> 19 Cr. 423 (ALC)

Dear Judge Carter:

I write with the consent of the government to request a further two-week extension of the briefing schedule for Mr. Wasiri's anticipated venue motion, which is presently due to be filed by November 5, 2021. I make this request because the parties are engaged in productive discussions that appear likely to obviate the need for motion practice.

A two-week extension of the motion deadline would make the defense motion due November 19, the government's opposition due December 10, and the defense reply due December 17. The parties submit that time should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h), through December 17, 2021, in the interest of justice.

Respectfully submitted,

<u>/s/</u>

Clay H. Kaminsky Assistant Federal Defender (212) 417-8749 / (646) 842-2622

cc: AUSA Jarrod Schaeffer

Transed.

11-2-21